

Annual 47 C.F.R. Section 64.2009(e) Customer Proprietary Network Information (CPNI)
Operating Procedures Compliance Statement
EB Docket 06-36

This *Operating Procedures Compliance Statement* for Gorham Telephone Company (the "Company") explains how the Company's procedures ensure that the Company is in compliance with the requirements set forth in Section 64.2001 *et seq* of the Commission's rules.

- A. Notice to customers of their right to restrict use of, disclosure of, and access to their CPNI is provided prior to solicitation for customer approval
- B. All Company employees will be trained annually on the Operating Procedures for properly safeguarding all CPNI. The Company employees review when they are and are not authorized to use or disclose CPNI, followed by a supervisory review process regarding compliance with CPNI rules. The Company also sends, via company email or other methods the Company choose to employ, information to employees relating to CPNI compliance.
- C. Every employee of the Company has a duty to protect the confidentiality of CPNI. A violation of the Company's operating procedures will result in disciplinary action. For a first violation, an employee will be given a warning and the violation will be noted on the employee's record. An employee will be subject to termination of employment for a second violation.
- D. The Company maintains records of our own and our affiliates' sales and marketing endeavors that use customer CPNI, including instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. Our records describe the event, the specific CPNI that was used in the event, and what products and services were offered as a part of the marketing and sales event. The Company retains records for a minimum of one year.
- E. The Company has established a review process for ensuring compliance with CPNI rules related to marketing activities. The Company's sales force and marketing personnel obtains approval of requests for CPNI information. Specifically, use of CPNI obtained from the Company's provision of one service category to market a second service category to individuals or businesses that are not already customers of that second service category is strictly prohibited.
- F. For safeguarding CPNI, the Company employs reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Company employees follow procedures designed to authenticate all customers prior to disclosing CPNI based on customer-initiated telephone contact or in-person visits.
- G. The Company will notify a customer immediately of account activity involving a change to an address of record. Notification may be sent by email, voicemail, text message or US Mail to both the customer's prior and updated address of record.
- H. In establishing a password, the Company authenticates the customer without the use of readily available biographical information, or account information. The Company has a back-up plan in the event of a lost or forgotten password.
- I. As required by CPNI rules and as outlined in the Company's operating procedures, law enforcement notification procedures are strictly adhered to. Should any breach of CPNI integrity be discovered, the Company will develop and maintain a record as to the date of the breach discovery, who discovered the breach, and the resulting notifications to the United States Secret Service and the Federal Bureau of Investigation no later than 7 days from the date of the discovery of the breach. The records of these discovered breaches will be maintained and held by the Company for no less than (3) years.

Signed Joyce M Murphy

Date 2/25/19